

U.S. Department of Justice

*United States Attorney
Southern District of New York*

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April 1, 2020

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *Bonner v. Central Intelligence Agency et al.*,
No. 19 Civ. 9762 (JMF)

Dear Judge Furman:

This Office represents defendants the Central Intelligence Agency (“CIA”) and Federal Bureau of Investigation (“FBI”) in the above-referenced Freedom of Information Act (“FOIA”) matter. We write respectfully to provide the Court with a status report, and to request that the current deadlines be stayed owing to the work disruptions caused by the COVID-19 pandemic. Plaintiff consents to this request to stay the proceeding.

Under the Court’s scheduling order ([ECF No. 22](#)), the FBI was scheduled to make its second and final production of responsive, non-exempt records on or about March 31, 2020, and the CIA is scheduled to make its next production of responsive, non-exempt records on or about April 28, 2020. Both agencies, however, will be unable to meet those deadlines. Because the individuals responsible for FOIA processing and production are now teleworking, and because the computer systems the agencies use to process FOIA requests are inaccessible from outside worksites, the agencies are unable to continue processing documents in response to plaintiff’s FOIA request at this time.

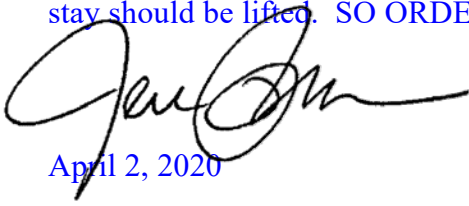
At this point, the agencies do not know when they will be able to resume normal FOIA processing and production. Accordingly, the parties respectfully request that this proceeding be stayed indefinitely. Counsel for the parties will remain in contact with each other, and propose that they continue to submit status reports on the first business day of each month, with the next report to be submitted by Friday, May 1, 2020.

We thank the Court for its consideration of this letter.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

Application GRANTED. In light of the COVID-19
pandemic, this matter is hereby STAYED indefinitely.
The parties shall submit a joint status letter by the first
business day of each month advising as to whether the
stay should be lifted. SO ORDERED.



April 2, 2020

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MEDIA FREEDOM AND
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